

Message

**From:** CN=Palmer Hough/OU=DC/O=USEPA/C=US [CN=Palmer Hough/OU=DC/O=USEPA/C=US]  
**Sent:** 9/28/2010 1:38:37 PM  
**To:** CN=Clay Miller/OU=DC/O=USEPA/C=US@EPA  
**Subject:** Re: Next steps on evaluating a potential pre-permit application 404(c) action in Bristol Bay

No prob, just let me know your thoughts when you have had a chance to look the attachment over.

-P

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Palmer Hough, Environmental Scientist  
tel: 202.566.1374 | fax: 202.566.1375

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U.S. EPA Headquarters (MC 4502T)  
1200 Pennsylvania Avenue, NW  
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**From:** Clay Miller/DC/USEPA/US  
**To:** Palmer Hough/DC/USEPA/US@EPA  
**Date:** 09/28/2010 09:30 AM  
**Subject:** Re: Next steps on evaluating a potential pre-permit application 404(c) action in Bristol Bay

At the oil spill hearing will not be in the office today. Will also be out of office most of tomorrow at usgs.

----- Original Message -----

**From:** Palmer Hough  
**Sent:** 09/27/2010 08:36 PM EDT  
**To:** Michael Szerlog; Phil North; Clay Miller  
**Cc:** Christopher Hunter; Brian Frazer; David Evans; Heidi Karp  
**Subject:** Next steps on evaluating a potential pre-permit application 404(c) action in Bristol Bay  
Michael/Phil/Clay:

As noted by Dave Evans in his email below, Denise Keehner met with key stakeholders from Bristol Bay last week. **Ex. 5 Deliberative**

# Ex. 5 Deliberative

## Ex. 5 Deliberative

Thanks, Palmer

[attachment "Key Questions Regarding a Potential Pre-Permit Application 404(c) Action in Bristol Bay.doc" deleted by Clay Miller/DC/USEPA/US]

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----- Forwarded by Palmer Hough/DC/USEPA/US on 09/27/2010 08:09 PM -----

From: David Evans/DC/USEPA/US  
To: Palmer Hough/DC/USEPA/US@EPA, Brian Frazer/DC/USEPA/US@EPA, "Richard Parkin" <Parkin.Richard@epamail.epa.gov>, "Mr. Michael Szerlog" <Szerlog.Michael@epamail.epa.gov>  
Date: 09/24/2010 05:50 PM  
Subject: Re: Summary of 9/22/10 OWOW meeting with Bristol Bay stakeholders

Thanks Palmer, almost feel like I was there (I wasn't, was I?). Sharing with Rick and Michael so they have benefit of your great summary.

## Ex. 5 Deliberative

Dave  
David Evans, Director  
Wetlands Division  
Office of Wetlands, Oceans and Watersheds  
(202) 566-0535  
(202) 725-6415 (cell)

-----Sent from my BlackBerry Wireless Handheld

----- Original Message -----

From: Palmer Hough  
Sent: 09/24/2010 03:22 PM EDT  
To: Brian Frazer; David Evans  
Cc: Denise Keehner; MichaelG Lee; Heidi Karp; Stacie Craddock; Christopher Hunter  
Subject: Summary of 9/22/10 OWOW meeting with Bristol Bay stakeholders  
Dave/Brian:

As you know, a number of Bristol Bay, Alaska stakeholders were in town this week and requested a meeting with OWOW. On 9/22/10, Denise Keehner and a number of her staff met with these stakeholders to hear their concerns regarding Pebble Limited Partnership's mining project which is proposed to be located in the headwaters of Bristol Bay. These stakeholders included representatives from local Tribes, the Bristol Bay Native Corporation, Bristol Bay Regional Seafood Development Association, Alaska Independent Fishermans Marketing Association, and environmental groups (TU and NRDC) (see attached sign-in sheet).

They described the unique and important natural resources found in Bristol Bay particularly its world class fisheries resources (e.g., sock-eye salmon). They described their concerns that the likely extensive environmental impacts associated with the proposed Pebble mine project would critically degrade the Bay's fisheries resources causing significant ecological and economic harm.

These stakeholders highlighted the widespread public concern regarding the proposed mining project, including widespread corporate opposition - most notably a coalition of jewelers led by Tiffany's and Co. that have pledged their support for the protection of Bristol Bay.

The stakeholders also discussed the requests that have been made to EPA to review the proposed project pursuant to our authority under CWA section 404(c). They noted how important it was that Administrator Jackson recently visited the area and met with stakeholders to personally hear their concerns.

During our meeting, stakeholders expressed their strong belief that, based on the nature and extent of the likely adverse impacts of the Pebble project and the quality and value of the natural resources at stake, EPA should take the extraordinary step of initiating review of this project under 404(c) even though a section 404 permit application has not yet been formally submitted by Pebble to the Corps of Engineers. Additionally the stakeholders noted that the need to act now is also based on their own concerns that the project's likely extensive environmental impacts would harm investment in Bristol Bay potentially hurting all of their interests.

Denise noted that EPA has heard their concerns, as evidenced by the Administrator's recent trip to the area, and that the agency is reviewing the requests for EPA action pursuant to 404(c). The stakeholders noted that they have compiled a great deal of scientific and technical information describing Bristol Bay's natural resources and their vulnerability to the impacts of mining and that they would share these materials with EPA to help inform our deliberations.

Please let me know if you would like additional information regarding this meeting.

Thanks, Palmer

PS: Some of the attendees did not make it onto the sign-in sheet (e.g. Wayne Nastri) but we are working with the meeting organizer to fill in these gaps and will circulate a complete sign-in sheet.

[attachment "9-22-10 BB stakeholders meeting with OWOW\_sign in sheet.pdf" deleted by David Evans/DC/USEPA/US]

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